

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

**UNITED STATES' AMENDED RESPONSE TO DEFENDANT'S
SENTENCING MEMORANDUM (DOC. 637)**

The United States hereby files this amended response to Defendant Hill's *Sentencing Memorandum* (Doc. 637) filed January 24, 2024. The United States was mistaken in its request for sentence, and would like to amend its on record request to comply with the agreements in the plea, as well as the change to the guidelines as noted in Document 611.

The addendum to the PSR drops one point from Mr. Hill's criminal history, resulting in a guideline range of imprisonment of 30 to 37 months. The United States agrees with this calculation. Furthermore, the United States requests the Court follow the plea agreement and not impose a term of supervised release as is agreed to in the plea agreement (Doc 369). The United States apologizes to the Court and counsel for these oversights in its original sentencing memorandum.

The United States respectfully requests this court sentence in accordance with the agreed upon terms of the plea agreement.

Respectfully submitted,

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Electronically filed 1/26/2024
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I HEREBY CERTIFY that on the 26th day of January 2024, I filed the foregoing pleading electronically through the CM/ECF system, which caused counsel of record for defendant to be served by electronic means.

Filed Electronically
LETITIA CARROLL SIMMS
Assistant U.S. Attorney